

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
MVK FarmCo LLC, <i>et al.</i> , ¹)	Case No. 23-11721 (LSS)
)	
Debtors.)	(Jointly Administered)
)	
)	

**VERIFIED STATEMENT PURSUANT TO RULE 2019 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

PLEASE TAKE NOTICE that pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the law firms of Burr & Forman LLP and Moore & Van Allen PLLC (the "Firms") hereby submit this verified statement (the "Rule 2019 Statement") with respect to the Firms' representation of Compeer Financial, PCA, Compeer Financial, FLCA, AgCountry Farm Credit Services, PCA, AgFirst Farm Credit Bank and Farm Credit Bank of Texas (collectively, the "Interested Parties") in the chapter 11 cases of the above-captioned debtors (the "Debtors"), and state as follows:

1. As of the date of this Rule 2019 Statement, the Firms represent only the Interested Parties in these chapter 11 cases and accordingly the Interested Parties are the only persons or entities with respect to which the Firms are required to file a Statement pursuant to Federal Rule of Bankruptcy Procedure ("Bankruptcy Rule") 2019.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: MVK FarmCo LLC (5947); MVK Intermediate Holdings LLC (6016); Gerawan Farming, LLC (1975); Gerawan Supply, Inc. (6866); Gerawan Farming Partners, LLC (0072); Gerawan Farming Services, LLC (7361); Wawona Farm Co. LLC (1628); Wawona Packing Co. LLC (7637); and GFP, LLC (9201). The location of the Debtors' service address is: 7700 N. Palm Ave., Suite 206, Fresno, CA 93711.

2. Pursuant to Bankruptcy Rule 2019, the attached Exhibit A (incorporated herein) lists each Interested Party's address and "the nature and amount of each disclosable economic interest," if any, held by each Interested Party.

3. Nothing contained in this Rule 2019 Statement is intended to, or should be construed (i) to waive any Interested Party's right to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (ii) to waive any Interested Party's right to have final orders in non-core matters entered only after *de novo* review by a United States District Judge; (iii) as consent to the jurisdiction of the Court over any matter; (iv) as an election of remedy by any Interested Party; (v) as a waiver of any Interested Party's right to trial by jury in any proceeding so triable; (vi) as a waiver of any Interested Party's right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (viii) as a waiver of any privilege or protection against disclosure including without limitation the attorney client privilege or the attorney work product doctrine; or (viii) as a waiver of any other rights, claims, actions, defenses, setoffs, or recoupments to which the Interested Parties or the Firms are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved. Additionally, nothing herein should be construed as a limitation upon, or waiver of, any rights of any Interested Party to assert, file, and/or amend any proof of claim in accordance with applicable law and any order entered in these chapter 11 cases.

4. The Firms reserve all rights to amend or supplement this Rule 2019 Statement as necessary for any reason in accordance with Bankruptcy Rule 2019.

5. The information contained herein is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose or use.

Dated: October 18, 2023

BURR & FORMAN LLP

/s/ J. Cory Falgowski

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